

# EXHIBIT 13

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE (HARVARD  
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DECLARATION of MARGARET M. CHIN, PhD,  
(COALITION FOR A DIVERSE HARVARD)**

Margaret M. Chin, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Margaret M. Chin. I graduated from Harvard College in 1984. I earned my PhD from Columbia University and am now a tenured Associate Professor of Sociology at Hunter College and the CUNY Graduate Center.
2. I am one of the five co-founders and Steering Committee members of the Coalition for a Diverse Harvard (“Diverse Harvard”), an organization with over 1,000 Harvard and Radcliffe alumni, faculty, and student members. We describe ourselves as, “Harvard and Radcliffe alumni and students fighting for diversity, equity, and inclusion at the University and in higher education at large.” I am authorized to submit this declaration individually and on behalf of Diverse Harvard.
3. Harvard played no role in the formation of Diverse Harvard, and we are fully independent of the University.

4. Diverse Harvard was formed in 2016 to (1) oppose a petition slate of five candidates running for the Harvard Board of Overseers, four of whom had written or testified extensively against race-conscious admissions and who publicly agreed with the positions now being taken by the plaintiff in this lawsuit; and (2) advocate for race-conscious and holistic admissions practices that support campus diversity.

5. At present, Diverse Harvard has over 1,000 members of diverse racial and ethnic backgrounds, including approximately 250 Asian American members. Our members have graduation years spanning seven decades.

6. In 2016, the alumni who founded Diverse Harvard endorsed and campaigned for the Overseer candidates who would support the University's race-conscious admissions practices and opposed the petition slate aligned with this lawsuit, marshaling the support of hundreds of Harvard alumni. All five petition candidates, four of whom opposed race-conscious admissions, were defeated.

7. Diverse Harvard also highlighted diversity issues in the 2017 and 2018 elections for Harvard Overseers and for Directors of the Harvard Alumni Association. In 2017, eight of the nine candidates endorsed by Diverse Harvard were elected, and in 2018, nine out of ten candidates endorsed by Diverse Harvard were elected.

8. Since 2016, Diverse Harvard has also devoted significant time and effort to advocacy on various issues related to diversity, ethnic studies, and race consciousness at Harvard University and has sponsored and supported public events to educate Harvard-affiliated individuals and the public at large on diversity in education and holistic college admissions processes.

9. For example, earlier this year, Diverse Harvard supported and helped organize a public panel at Harvard entitled “Students for Fair Admissions v. Harvard - Why Asian Americans?” The panel was attended by current Harvard students who engaged the panelists in discussions about this lawsuit and the role of Asian Americans in Harvard’s admissions process.

10. The founding alumni members of Diverse Harvard incorporated Coalition for a Diverse Harvard, Inc. in 2018 and, with the help of more than 1,000 Harvard alumni and student members, continue to promote campus diversity by supporting the inclusion of race as one factor among hundreds in Harvard’s holistic admissions review process.

11. The vast majority of Diverse Harvard’s members are alumni of one or more schools within Harvard University. Most of the remaining members are current students at the University, primarily undergraduates.

12. The members of Diverse Harvard strongly oppose the plaintiff’s attempt to prohibit the consideration of race in college admissions in this lawsuit. Some members of Diverse Harvard have been advocating for diversity at Harvard for decades.

13. Diverse Harvard also includes alumni who have volunteered as Harvard admissions interviewers. In addition, some members of Diverse Harvard have children applying to, or currently attending, Harvard and want to ensure that their own children benefit from a diverse learning environment.

14. As former and current students of Harvard University, Diverse Harvard members are uniquely qualified to opine on the benefits of Harvard’s race-conscious admissions process. Our members who are current students have a direct interest in continuing to receive the benefits of diversity at Harvard College. Members of Diverse

Harvard who attended Harvard College since the 1970s have benefited from learning in an environment made more diverse by race-conscious admissions. Older members of Diverse Harvard can also attest to the importance of a diverse student body, and how their educational experiences were negatively affected by learning in a Harvard much less diverse than the University of today.

15. Also, Diverse Harvard members who are Asian American (as are the majority of Diverse Harvard's founders and Steering Committee) believe it is essential for Harvard's admissions process to maintain its focus on the "whole person."

Considering the claims made by the plaintiff in this lawsuit, Diverse Harvard believes it is vital for this Court to hear from Asian American students and alumni of Harvard University, and other supporters of the school's race-conscious admissions policy, as it considers this action.

16. I was admitted to Harvard not long after, in response to the demands of student activists, the College began recognizing Asian Americans as a racial minority in admissions in 1976. I have personally benefited from whole-person, race-conscious admissions practices. The diversity I experienced in the Harvard community—both inside the classroom and out—enriched my education and has had a profound impact on my life and my career.

17. I was born in New York City and attended public schools. My parents were Chinese immigrants, my mother a garment worker and my father a waiter. At Stuyvesant High School, I was editor-in-chief of *Kaleidoscope*, the foreign language magazine. As a member of the Red Cross Youth Speak Out Task Force, I helped organize a city-wide conference on the problems of youth. I took an intensive multi-week

computer science honors program for high school students at the NYU Courant Institute of Mathematical Sciences after my sophomore year, and I was invited back to teach a number of courses in the program the following summer, which was rare because the other lecturers were college or graduate students.

18. My parents did not attend college, and it did not cross my mind to apply to Harvard until I attended a college fair in New York's Chinatown in 1979. At the fair, I was recruited by Asian American students from Harvard who were employed by the College's Undergraduate Minority Recruitment Program. The Undergraduate Minority Recruitment Program was one element of Harvard's affirmative action plan. My SAT scores were not outstanding, and I was excited to be admitted to Harvard.

19. Being Asian American and a first-generation college student is a central part of my identity. When I arrived at Harvard, I was intimidated but also happy to be able to learn alongside not only other Asian American students, but also students of all races, ethnicities, religions, socioeconomic backgrounds, regions of the United States, and nationalities. I turned to my multicultural dorm-mates to help lead the way when I had no clue, especially since I had never lived away from home. We clearly had different experiences, values, and perspectives on life while also sharing many commonalities. The lessons that I learned about our differences and shared values during discussions in the classroom, dining hall, and late nights in the dorm transformed me and still shape my work today.

20. For three years, I worked in the Admissions Office for the Undergraduate Minority Recruitment Program as a student recruiter and the Asian American Coordinator. In that capacity, I organized and went on student recruitment trips to high

schools in areas, such as New York City and California, that had significant numbers of Asian Americans.

21. Of course, many urban areas that had high numbers of Asian American students also had high numbers of Black and Latino students. Thus, all the minority recruiters recruited for members of all minority groups. We worked hard to learn about the unique issues facing students of all races, ethnicities, and socioeconomic backgrounds. We also worked to educate admissions officers and administrators about cultural issues, language barriers, and immigration experiences that would impact the education and evaluation of minority applicants.

22. I was a co-President of the Asian American Association (“AAA”). The AAA was the largest pan-Asian student group hosting membership events for Asian American students. Through presentations, films, cultural festivals, and a newsletter, we engaged in ongoing efforts to educate the Harvard community about the experiences of Asian Americans.

23. AAA pressured the University to hire more Asian American professors and offer courses in Asian American studies. At the time, Harvard offered only one course in Asian American studies that I could take. Thirty-five years later, because Harvard lags significantly behind other comparable institutions in the area of Ethnic Studies, I continue to actively campaign for Harvard to improve Ethnic Studies as a member of the Harvard Asian American Alumni Alliance.

24. As an undergraduate, I was also a founding member of the Third World Students’ Alliance. We advocated to get minority events listed alongside other activities in the freshman week calendar to avoid being relegated to second-class status. As a

student activist and leader in both the AAA and the Third World Students' Alliance, I advocated for students of all backgrounds to be given the opportunity to study and share their ancestries on campus. This advocacy often involved protests and adversarial relationships with Harvard administrators.

25. By the time I was a senior, I felt supported as a member of the minority student community at Harvard, and I was able to share my experiences and interests as a person of color at the College. I worked for the Harvard Foundation for Race Relations, coordinating and planning public events aimed to promote cross cultural understanding on campus.

26. My undergraduate life and activities brought me into contact with students from all kinds of backgrounds. Diversity was not an abstract concept at Harvard. My everyday life on campus was richer for all the people with whom I lived, met, and worked over my four years as an undergraduate at Harvard.

27. Outside of Harvard, I was a member of the East Coast Asian Student Union ("ECASU") Joint Admissions Task Force. The member colleges sponsored college fairs in Boston and New York City. We advocated for Asian American students in the article "Admissions Impossible" in 1983, an article that has been misleadingly cited in the plaintiff's complaint in this lawsuit. Our survey of 25 universities indicated that the admissions rate for Asian Americans lagged behind the rate for all other ethnic groups, including white applicants.

28. Instead of demanding the elimination of race as a consideration in admissions, as plaintiff seeks in this lawsuit, we urged colleges to set up minority recruitment programs, to hire Asian American admissions officers, to increase training on



cultural bias, and to become educated on stereotypes that worked against Asian American applicants. We believed it was better for Asian Americans to be recognized than to be unintentionally excluded. We also decried insufficient financial aid and other barriers that kept out applicants who were poor or from inner cities. By that time, Harvard had incorporated Asian Americans into its Minority Recruitment Program (which directly led to me attending Harvard) and was increasing the number of Asian American students from low-income families, but greater efforts were needed.

29. After I graduated from Harvard, I worked at IBM. Then, because I knew from my studies at Harvard that there was a lack of research on working class communities and on Asian Americans in general, I decided to pursue my PhD and conduct research that would broaden perspectives on questions of equality. After concentrating in immigration, the working poor, race, and ethnicity, I earned my PhD with distinction from Columbia University.

30. I am now an Associate Professor of Sociology teaching courses ranging from “The Sociology of the Family” to “Migration and Immigration to New York City.” I have received an American Sociological Association’s Minority Fellows Award, a National Science Foundation dissertation grant, a Social Science Research Council postdoctoral fellowship in international migration, and a Woodrow Wilson Foundation fellowship for junior faculty. I was the Vice President of the Eastern Sociological Society and wrote the book *Sewing Women: Immigrants and the New York City Garment Industry*.

31. Today I continue to study and teach about issues of equity and equality that stem from my experiences as a Harvard undergraduate. I am currently conducting

research for "*The Peer Effect*," a study of Stuyvesant High School and its 1980-2000 graduates, and am writing my next book, "*Playing the Professional Game*," on second-generation Asian Americans in the corporate world. Incidentally, my research shows that Asian American adults benefit when diversity programs include them in the work world.

32. Around 2000, I was asked by a college friend, who subsequently became a Harvard admissions officer, to be an alumni interviewer for the NYC Harvard Schools Committee. After interviewing for over a decade, I served a five-year term as a Schools Committee subcommittee co-chair, coordinating over 50 alumni interviewers and over 125 high school student interviews each admissions season. It was our responsibility to ensure that applicants assigned to our subcommittee received an interview and a fair evaluation.

33. Over the years, I have also met hundreds of student applicants at recruiting events and receptions for admitted students. I have observed that the number of interviewers of color, especially Asian Americans, has increased dramatically in the time period since 2000. I myself have encouraged Asian Americans to volunteer their time on this effort.

34. Every year, we see many highly accomplished applicants get rejected, and that can be heartbreaking. While I am not aware of every aspect of the Harvard interviewing or admissions processes, I have not personally observed the differential treatment of Asian American applicants interviewed by our subcommittee compared to applicants of other races or ethnicities.

35. As an alumna, it was distressing to find that, in October 2014, about 400 members of the Harvard community, most of them Asian American women students,

received an email addressed to “slit-eyes,” with the writer threatening to come to the Harvard campus the following day to “shoot all of you” and “kill you individually.” The source of the death threats continued to contact Asian women students at Harvard throughout October, and in December 2014 a separate threatening email was sent to 80 Asian women students at Harvard.

36. Information about these incidents were reported in the Harvard Crimson, and can be found online at <https://www.thecrimson.com/article/2014/10/8/discussion-criticize-response-threat/>; <https://www.thecrimson.com/article/2015/4/6/email-threats-investigation-ongoing/>.

37. Asian American students and alumni, including myself, banded together to complain to Harvard administrators and the Harvard University Police Department about their lackluster responses to these hate crimes. No perpetrator has been identified to this day. Only after repeated demands by a coalition of alumni and faculty groups of various backgrounds did President Faust address the issue directly at all, despite the fear and trauma that these incidents elicited among Asian American students on Harvard’s campus.

38. It was upsetting that it took so long for this incident to be addressed. One former Asian American female Harvard student expressed the trauma and disappointment of this incident in an op-ed in the Harvard Crimson. That op-ed can be found online at <https://www.thecrimson.com/article/2015/12/1/email-threat-breaking-point/>.

39. My fellow co-founder and colleague on the Steering Committee of Diverse Harvard, Michael Williams, is an African-American graduate of Harvard. He also speaks powerfully about the importance of Harvard having a diverse student body.

The students that he met in college expanded his view of the world and set him on a different career path. He graduated from Harvard with a commitment to do what he could to improve the lives of underrepresented people.

40. Mr. Williams decided to become a lawyer and has spent virtually his entire career working with and representing low-income people in New York City, primarily people of color. He attests that he benefited immensely from Harvard's holistic admissions policy not only when he applied, but also as a student at Harvard in the Class of '81. The diverse group of friends that he made at Harvard literally changed his life for the better.

41. Another co-founder of Diverse Harvard is Kristin Penner, a white woman who graduated from Harvard in 1989. She speaks of the benefits that she gained as a white undergraduate living with, and learning from, students from diverse backgrounds and experiences. Her interactions with students of color in the classrooms and dorms at Harvard made a profound impact on her academic and professional life. Previously interested in gender equality, she broadened her focus to include the role of race in women's lives, which led to her eventually working directly for women and children in her community.

42. As a psychotherapist in community mental health programs, her prior experience with diverse groups made it possible for her to work effectively cross-culturally with Asian American, Latinx, and African American women and children. She can attest that, as a white woman, she too was a beneficiary of a holistic admissions policy, both in her own admission to Harvard and in making personal and academic connections that led to an expanded view of how she could contribute to her community.

43. Based on my experiences as a Harvard student, alumni interviewer, subcommittee chair, and parent, I believe that Harvard has made tremendous strides in admitting applicants of all racial and ethnic backgrounds and students from first-generation and low-income backgrounds. The financial aid program has increased dramatically. In my class, there were 131 Asian students (perhaps including foreign citizens); in the most recent first-year class, there are approximately 350 Asian Americans. In the two most recent first-year classes admitted, over half the students admitted have been students of color. I believe that this campus diversity will better prepare all these students to become leaders who can address the complex issues, including race and inequality, facing the world.

44. In 2016, I read in the New York Times that a number of conservative activists, who had written or testified extensively against race-conscious admissions, were running for the Harvard Board of Overseers on a petition slate. It was clear that they were using Asian Americans as a cover to attack the whole-person admissions process and establish a complete bar against any consideration of race, so I joined with other alumni to form the Coalition for a Diverse Harvard. Diverse Harvard has been a wonderful opportunity to connect with other Harvard graduates, most of whom I have never met before, who are as passionate as I am about the need for a diverse learning environment at Harvard to educate leaders who can work to improve our communities, country, and world.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, July 29, 2018.

/s/ Margaret Chin  
Margaret Chin